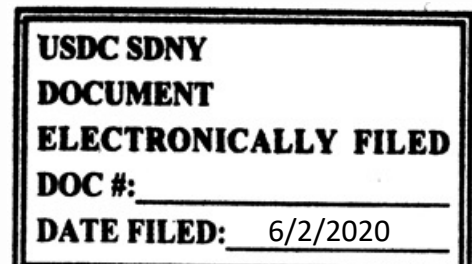




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June 1, 2020

**Via ECF**

Honorable Stewart D. Aaron, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Levy v. United States*, 18 Civ. 3931 (JEN)

Dear Judge Aaron:

As the Court is aware, we represent the plaintiff in the above-referenced matter.

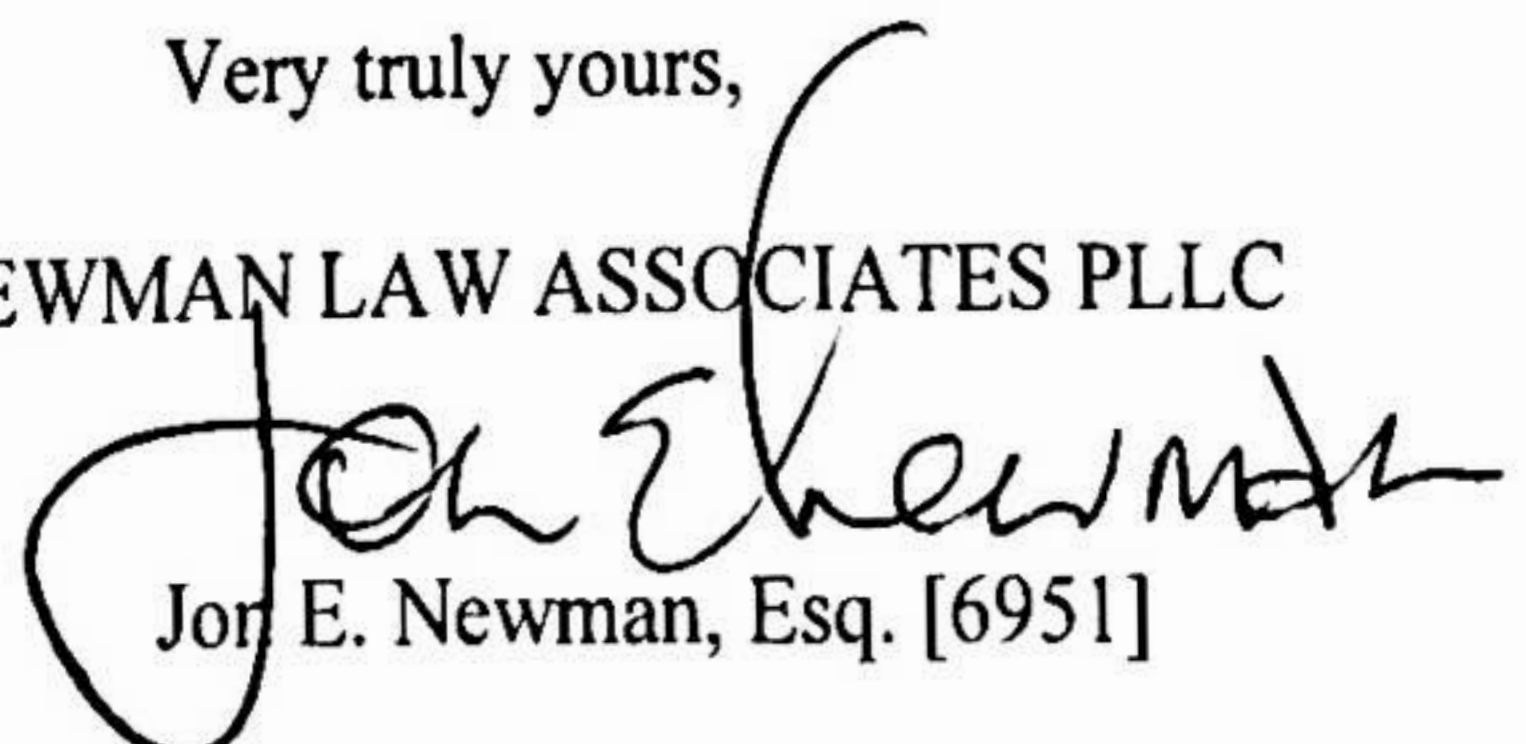
I respectfully write the Court today to request an extension of the discovery timeline in this case, with the following good-cause. The COVID-19 prevented me from meeting with witnesses on this case for a substantial period of time, and getting together substantive responses to the Government's discovery requests. Then last month my father was admitted to St. Francis Hospital with a stroke diagnosis, and my mother and I have been coordinating his medical care since his discharge. It's been rough sledding of late to say the least. I spoke with Assistant U.S. Attorney, Kirti Vaidya Reddy, Esq. earlier this morning and jointly we respectfully offer the following proposed revised discovery schedule in light of the aforementioned issues:

1. Responses to all party discovery requests by July 1, 2020;
2. All Depositions completed by September 1, 2020;
3. Completion of Expert Discovery by November 1, 2020.

Please note that all parties have exchanged a considerable amount of Court ordered discovery to date. Plaintiff has provided extensive medical discovery, inclusive of all HIPAA-compliant authorizations for plaintiff's providers. The Government has requested and received voluminous records and recently forwarded those records to us. I thank the Court for its consideration of this request and would gladly discuss further by telephone conference.

Very truly yours,

NEWMAN LAW ASSOCIATES PLLC

  
Jon E. Newman, Esq. [6951]

Application GRANTED. The remaining deadlines regarding dispositive motions and pretrial submissions (see ECF Nos. 28 & 41) are adjourned *sine die*. The Court expects the parties to diligently pursue discovery. It is hereby Ordered that, pursuant to Rules 30(b)(3) and 30(b)(4) of the Federal Rules of Civil Procedure, all depositions in this action may be taken via telephone, videoconference, or other remote means. It is further Ordered, pursuant to Rule 30(b)(5), that a deposition will be deemed to have taken place "before an officer appointed or designated under Rule 28" if such officer attends the deposition using the same remote means used to connect all other participants, so long as all participants (including the officer) can clearly hear and be heard by all other participants. The parties are strongly encouraged to engage in discovery through remote means at every available opportunity. The parties shall file a Joint Letter regarding the status of discovery on August 14, 2020. SO ORDERED.  
Dated: June 2, 2020

*Attch a*

cc: BY ECF; AUSA, Kirti Vaidya Reddy, Esq.